Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

In the Matter of	)	
	)	
Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band	)	ET Docket No. 13-49
	)	
	)	
	)	

COMMENTS OF GENERAL MOTORS COMPANY

General Motors Company ("GM") submits these comments in response to the Notice of Proposed Rulemaking issued by the Federal Communications Commission ("FCC" or "Commission") in the above-captioned proceeding.[1] GM has joined the Alliance of Automobile Manufacturers and the Association of Global Automakers' comments in this proceeding ("Alliance Comments") and submits these separate comments to reiterate its support for them.

In 1999, the Commission allocated 75 MHz of spectrum in the 5850-5925 MHz ("5.9 GHz") band specifically for Dedicated Short Range Communications ("DSRC") to be used

[1] Revision of Parts 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49, *Notice of Proposed Rulemaking*, 28 FCC Rcd 1769 (2013).

by Intelligent Transportation Systems for enhanced vehicle safety applications.[2] Since that time, GM and other automakers have been developing "connected vehicle" safety solutions in this dedicated spectrum band. DSRC has the potential to prevent crashes through features such as forward crash and blind spot warnings. DSRC can also be used for immediate driver warnings of traffic congestion, inclement weather or accidents. A more detailed discussion of DSRC and its capabilities can be found in the Technical Appendix of the Alliance Comments.

DSRC technologies have the potential to greatly reduce the 6 million crashes and more than 30,000 deaths that occur on U.S. roadways annually. DSRC holds great promise for saving lives, and tremendous progress has been made toward its widespread deployment. Indeed, significant resources have already gone into the development of standards and technologies that will form the foundation for DSRC's widespread deployment. Successful deployment and acceptance of DSRC systems also involves a variety of stakeholders. Federal agencies, industry-standards organizations, and equipment manufacturers, along with automakers, are critical to realizing DSRC's full potential. All of these stakeholders would agree that DSRC requires an interference-free environment, and any uncertainty surrounding this could derail the entire effort. Quite simply, the 5.9 GHz band is essential for connected vehicle safety applications, and these enhanced safety features contain stringent communication requirements that must be protected.

Accordingly, GM reiterates the Alliance Comments' request that the Commission allow for proper due diligence on whether the 5.9 GHz band can accommodate sharing with unlicensed U-NII devices. There needs to be a focused and disciplined, data-driven process to address this issue, particularly because to date, there has not been adequate testing to determine if unlicensed

[2] Amendment of Parts 2 and 90 of the Commission's Rules to Allocate the 5.850-5.925 GHz Band to the Mobile Service for Dedicated Short Range Communications of Intelligent Transportation Services, ET Docket No. 98-95, RM-9096, *Report and Order*, 14 FCC Rcd 18221 ¶ 1(1999).

UN-II devices interfere with DSRC. The National Telecommunications & Information Administration ("NTIA") has already concluded that further analysis is needed.[3] It is, therefore, imperative that (at minimum) any timelines in the Commission's proposed rulemaking are consistent with the NTIA's testing schedule and final recommendations.[4] GM urges the Commission to refrain from taking premature action in this proceeding. It is important that the Commission only consider 5.9 GHz spectrum sharing after non-interference with DSRC has been objectively demonstrated through proper testing, and after all relevant stakeholders have been afforded the opportunity to weigh in. While GM recognizes the importance of increasing spectrum for unlicensed U-NII devices, proper consideration must be given to prevent any potential harmful interference to DSRC technology in the 5.9 GHz band.

Respectfully submitted,

General Motors Company
Michael J. Robinson
Vice President
Sustainability and Global Regulatory Affairs
300 Renaissance Center
Mail Code 482-C27-B81
Detroit, MI 48265
Phone: (313) 665-4940
E-Mail: michael.j.robinson@gm.com

Harry M. Lightsey III
Executive Director
Global Infotainment and OnStar Public Policy

Date: May 24, 2013

[3] Department of Commerce, Evaluation of the 5350-5470 MHz and 5850-5925 MHz Bands Pursuant to Section 6406(b) of the Middle Class Tax Relief and Job Creation Act of 2012 at 5-13 (2013), *available at* http://www.ntia.doc.gov/files/ntia/publications/ntia_5_ghz_report_01-25-2013.pdf.

[4] *See id.* at 6-4.